

Figure 5-1. ATOS Surveillance Reporting Guidelines.

- **General Instructions for reporting SAI/EPI activities.**
 - SAI and EPI usually involve multiple activities over multiple dates and may involve multiple locations (a sufficient number of activities to answer all the questions and perform a thorough, quality inspection).
 - The inspection record comprises all of these individual activity records.
 - The ATOS policy and procedures appendix says very little about inspection activities and inspectors have had a lot of questions about how many to do and how to know when it is time to close an activity.
 - A general rule of thumb is that any time that the banner information changes, (date, location, aircraft, etc.) it is a new activity.
 - It is not the intent to have an activity record for every individual record you look at, but maybe each set of records at that location on that day.
 - The function you are looking at may be more important than the time or place.
 - Most activities will probably be opened and closed in a single day.
 - An activity is a snapshot of what the operator is doing at that moment.
 - To get a clear, big-picture, you go out again and take another snapshot.
 - Don't try to become an analyst and "roll-up" the individual observations into a single activity that you report.
- **Reporting Observations unrelated to the SAI or EPI.**
 - There has been a lot of discussion about reporting "pop-ups" – things that an inspector happens upon while out in the field or special inspection requirements that come up.
 - The Dynamic Observation Reports provide a place to record surveillance observations that are unrelated to the element inspection being performed. A memorandum describing the appropriate use of those reports is in [Figure 5-4](#).
 - Special inspection requirements can generally be accommodated through retargeting.
 - Handbook bulletins that require special surveillance activities generally include specific instructions for ATOS carriers.
- **ATOS does not change an inspector's responsibility to investigate and act on safety or regulatory concerns.**
 - There is nothing to preclude any inspector from investigating something they notice or have reported to them concerning an ATOS carrier, but that is an investigation activity, not a surveillance activity.
 - Investigation, certification, and technical administration activities are still reported under PTRS.
 - Remember to record the actions you have taken related to deficiencies observed in the Reporting Inspector Action Taken field.
 - In addition, you need to promptly notify the PI or other appropriate CHDO/CMO personnel via telephone or electronic mail if you observe a significant safety or regulatory concern that required your immediate action or may need additional investigation.

- **SAI/EPI Inspection Screen Data Fields.**
 - Enter all the information you have available from that activity.
 - Do NOT enter the word “**none.**” If a particular comment field does not apply, just leave it blank.
 - At a minimum, every inspection activity should include Activity Start Date, Activity End Date, and Departure Point/Location.
 - If the inspection activity involves an aircraft, the registration number and make, model and series must be entered.
 - If the activity involves an aircraft flight, arrival point, departure point, and flight number must be entered.
 - Specific instructions for conducting each EPI and reporting those activities are found in that data reporting tool.
 - Guidance for each data field is found in the ATOS Automation User Guide and in the ATOS Data Quality Guidelines.
- **Entering comments.**
 - Write in clear, concise language using sentence case and proper spelling.
 - Explanations should be complete and descriptive, with as much information as necessary for other CMT members to understand the findings without requiring further information from the inspector.
 - References should be entered when appropriate; such recording on the SAI where the procedures and controls for that element are located.
- **Name of a clearly definable person.**
 - Some questions require that a name be entered.
 - There is confusion on the intent of this question and the definition of the word “person”.
 - In any organization there is not always one individual who is in charge; authority and responsibility are often disbursed.
 - A person can be an individual, a department, a committee, or a position.
 - The intent is to identify the highest level person who is responsible or has the authority for that particular element of the air carrier’s system.
- **“Yes” responses.**
 - The data reporting tool questions are written so that “yes” is always a favorable response.
 - Read the question through and answer it based on just the activity that was performed.
 - For example, if the question asks “Were written procedures consistent across manuals?” Respond to that question only as it relates to the manuals you looked at during that activity. If you only looked at one manual, don’t answer the question.
- **“Yes” responses do not require comments.**
 - “Yes” comments should not change the meaning of the “yes” response to “sometimes or maybe.”
 - Any negative wording in a “yes comment” is inappropriate and probably indicates that the question should have been answered “no.”
 - The comment/findings should be complete and descriptive.
 - The comment field is not intended to capture negative, unsatisfactory, or qualifying (yes,

- but) information.
- The comment field is not intended as a catchall for describing inspection activities.
- **“Maybe.”**
 - There is no “maybe” response. Questions are answered either yes or no.
 - If the inspector is unsure whether something observed was unsatisfactory or potentially unsatisfactory, the question should not be answered for that activity.
 - The inspector needs to do additional research and plan another activity, to make a definitive determination.
- **“No” responses.**
 - The data reporting tool questions are written so that “no” always indicates a negative response to the question.
 - Read the question through and answer it based on just the activity that was performed.
 - The intent was never that a single “no” answer would equate to an unsafe condition or a regulatory violation, unless that particular “no” has a regulatory basis.
 - The safety attributes on an SAI are organizational principles that provide a frame of reference to inspectors as they evaluate an operator's systems. A “no” answer for a system safety based question simply identifies a risk factor that requires further analysis.
 - A “no” answer for a regulatory requirement would be handled through established compliance and enforcement procedures.
 - Inspectors need to be very careful in requiring air carriers to satisfy all questions. We should never require a response from the air carrier for each and every “no” answer.
 - Regulatory requirements (referenced on each data reporting tool) are the minimum safety standards and must be complied with where as system safety raises safety above this minimum.
- **Writing Explanations on “No” Responses.**
 - No answers require an explanation of the Who, What, Where, When, and How that caused the “no” response.
 - “No” responses provide valuable information that, when rolled up and analyzed with other similar data, may well lead to an increase in surveillance of a particular system element process even though no regulations were violated.
 - The explanations are captured in a database that is analyzed for trends or patterns to determine if any action is required by the CMT.
- **“Not Applicable (N/A).”**
 - “N/A” means not applicable at all to that air carrier’s operation.
 - It does not mean you didn’t look at that.
 - There really are questions that do not apply to an air carrier.
 - If the question is not applicable to the specific activity or observation the inspector is making at that point in time, then leave the question unanswered.
 - Misuse or overuse of not applicable corrupts the data.
- **Inspector Action Taken.**
 - This field provides a place to record actions taken by reporting inspectors related to

deficiencies observed during the inspection.

- These actions may include notifying appropriate air carrier personnel of a potential non-compliance, consulting with air carrier or other FAA officials to obtain additional information, or initiating an enforcement investigation.
- Do not enter a description of what you did to complete the particular inspection activity being reported. The intent of this field is NOT to capture what records you looked at or processes you observed.

- **PI Response Requested.**

- The purpose of this field is to help the reporting inspector bring some specific information to the attention of the PI.
- By checking this field, the inspector is asking the PI to review some information contained in the report and give the inspector some feedback.
- This is not intended for use with time-critical information that needs a rapid response since the information is not available to the PI until after it has been evaluated and released to the ATOS data repository.